

EXHIBIT A

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

JOSEPH S. FERRETTI
DIRECT DIAL: +1 202 776 7863
PERSONAL FAX: +1 202 478 2811
E-MAIL: jsferretti@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*
ALLIANCES IN MEXICO
AND SRI LANKA

December 31, 2020

VIA EMAIL

Ruben Honik, Esq.
Golomb & Honik, P.C.
rhonik@golombhonik.com

David Stanoch, Esq.
Kanner & Whiteley, LLC
d.stanoch@kanner-law.com

Adam Slater, Esq.
Mazie Slater Katz & Freeman, LLC
aslater@mazieslater.com

Daniel Nigh, Esq.
Levin Papantonio Thomas Mitchell
Rafferty & Proctor, P.A.
dnigh@levinlaw.com

Conlee Whiteley, Esq.
Kanner & Whiteley, LLC
c.whiteley@kanner-law.com

Re: **In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**
Civ. No. 19-2875 (D.N.J.)

Counsel:

Pursuant to the Court's December 23, 2019 (Doc. 328), April 20, 2020 (Doc. 416), and June 23, 2020 (Doc. 487) Orders and June 3, 2020 instruction in the above-referenced matter, and subject to the Discovery Confidentiality Order (Doc. 139, the "DCO"), defendant Zhejiang Huahai Pharmaceutical Co., Ltd ("ZHP") is producing documents through the Aquipt document repository as production volume ZHP028 (ZHP02666949 – ZHP02671217). These documents are from the custodial files of Xavier Tang, a document custodian added by agreement of the Parties.

This production of documents is made subject to the objections made by counsel during the December 11, 2019 conference with Judge Schneider. ZHP reserves any and all objections as to relevance, materiality, privilege, admissibility, or any other grounds on which an objection may be made.

DUANE MORRIS LLP

505 9TH STREET, N.W., SUITE 1000 WASHINGTON, D.C. 20004-2166

PHONE: +1 202 776 7800 FAX: +1 202 776 7801

Duane Morris

Ruben Honik, Esq.
David Stanoch, Esq.
Adam Slater, Esq.
Daniel Nigh, Esq.
Conlee Whiteley, Esq.
December 31, 2020
Page 2

This production of documents contains document families with responsive documents that are being redacted or withheld on the grounds of privilege or work product. We will provide a privilege log in accordance with the Court's instructions.

The ZHP Parties are also producing an overlay file with natively redacted Excel files through the Aquipt document repository in order to provide files that were not previously included in various prior production volumes. By agreement with Plaintiffs' counsel, the ZHP Parties previously produced slip sheets for these files but needed more time to redact and produce the native files.

The ZHP Parties are also producing an overlay file with replacement images and native files with downgraded confidentiality designations in the meta-data, on the images, and in the native file titles. These replacements relate to documents in various production volumes.

Sincerely,

/s/ Joseph S. Ferretti

Joseph S. Ferretti

cc: Lori G. Cohen (cohenl@gtlaw.com)
Clem C. Trischler (cct@pietragallo.com)
Jessica M. Heinz (Jheinz@c-wlaw.com)
Janet L. Poletto (jpoletto@hkmpp.com)
Alexia Brancato (alexia.brancato@kirkland.com)
Behram Parekh (behram.parekh@drllawllp.com)
Cheryll Calderon (ccalderon@mazieslater.com)
Ashleigh Raso (araso@meshbesh.com)
Joey Argenal (argenal@csdisco.com)
Jeremy Robertson (robertson@csdisco.com)
valsartan@csdisco.com
valpec@kirtlandpackard.com

EXHIBIT B

KANNER & WHITELEY, L.L.C.
701 Camp Street
New Orleans, Louisiana 70130
(504) 524-5777
FAX: (504) 524-5763

May 7, 2020

Via Email

Seth A. Goldberg, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
SAGoldberg@duanemorris.com

RE: *In re Valsartan, Losartan and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875 (Prioritized Discovery)

Counsel:

I write further to the Parties' telephonic meet-and-confer of May 5, 2020, regarding prioritization of discovery.

During the Parties' May 5, 2020 call, Defendants requested that Plaintiffs provide, in writing, a list of non-custodial documents which Plaintiffs requested be produced as soon as practicable, as well as information Plaintiffs required in order to prioritize custodial productions.¹

Non-Custodial Documents

Plaintiffs request that Defendants prioritize production of the below-delineated categories of non-custodial documents:

Contracts and Agreements

- Quality Supplier Agreements for the sale of Valsartan API (*See* RFPD Nos. 6, 10, 25, 96, 97, 98); and

¹ During the meet-and-confer, Plaintiffs made multiple efforts to gather information about what categories of non-custodial and custodial documents had already been collected, such that the prioritization requests could be accordingly narrowed or tailored. Plaintiffs made these inquiries for the purposes of efficiency and in an attempt to avoid needlessly wasting Defendants' resources, which Defendants have represented are scarce at this time. Defendants would not confirm what documents had been collected, beyond sales and pricing data. However, Defendants did assure Plaintiffs that any documents that are already collected will be produced first regardless of any prioritization made by Plaintiffs. As such, Plaintiffs provide the information in this letter with the understanding that Defendants will be producing *all* responsive documents currently in Defendants' possession by the July 15, 2020, Court-ordered deadline. *See* D.E. 416.

- Quality Supplier Agreements for services provided by solvent recovery vendors and outside laboratories used for the manufacture of Valsartan API or testing of Valsartan API (*See* RFPD Nos. 6, 119, 120).

API Manufacturing Quality Assurance Documents

- Deviation Investigation Reports for Valsartan API manufacture and any root cause analyses associated with those deviations (*See* RFPD Nos. 19, 20, 21, 22);
- OOS and OOT Reports for Valsartan API manufacture and any root cause analyses for those deviations (*See* RFPD Nos. 19, 20, 21, 22);
- Corrective and Preventative Action Plans (“CAPA”) implemented regarding the manufacture of Valsartan API (*See* RFPD No. 19, 20, 21, 211, 58); and
- Certificate of Analyses for Valsartan API (*See* RFPD No. 26).

Finished Dose Manufacturing Quality Assurance Documents

- Validation Specifications associated with Valsartan API (*See* RFPD Nos. 10, 19, 20, 21, 22);
- Certificate of Analyses associated with Valsartan API (*See* RFPD Nos. 10, 19, 20, 21, 22, 26); and
- OOS and OOT reports, and any root cause analyses, as a result of Valsartan API testing and/or validation (*See* RFPD Nos. 10, 19, 20, 21, 22).

Foreign Regulatory Documents

- Foreign Inspection Reports of Facilities which Manufactured Valsartan API or Finished Dose (*See* RFPD No 56, 57).

Custodial Documents

Plaintiffs are in the process of identifying priority custodians for all Defendants related to the following categories of responsive documents:

- Documents and communications related to the sale of API, including any quality issues and/or complaints related to API (such as, for example, ZHP’s communications with Novartis regarding the quality of Valsartan API and Novartis’s subsequent nitrosamine testing). *See* RFPD Nos. 6, 10, 25, 93, 96, 97, 98.
 - Plaintiffs have identified the following agreed-upon custodians as potentially having responsive documents:
 - **ZHP:** Jenson Ye, Min Li, Jucai Ge, Jie Wang;
 - **Mylan:** Satish Mahanti, Yasir Rawjee;
 - **Teva:** Stefan Karlsson, Jens Nassall, Corey Sawyer;
 - **Aurobindo USA:** Daniel Burns, Prasad Gorijavolu, Steve Lucas, Bhadresh Joshi; and
 - **Torrent:** Paras Sheth, Dhurmit Shah, Sushil Jaiswal.
- Documents and communications related to deviation reports, OOS/OOT and other quality assurance reports and investigations associated with API manufacture and/or testing. *See* RFPD Nos. 19, 20, 21, 22.
 - Plaintiffs have identified the following agreed-upon custodians as potentially having responsive documents:
 - **ZHP:** Jenson Ye, Min Li, Jucai Ge, Jie Wang, Zhao Caifeng, Dong Peng, Hu Yuelin, Li Qiangming;

- **Mylan:** Antonyraj Gomas, SVSJ Rama Varma, N. Anjani Kumar, K. Naveen Kumar, Yasir Rawjee, P. Srinivasa Rao;
- **Teva:** Clarie Lyons, Dan Baretto;
- **Aurobindo USA:** Daniel Burns, Jeffrey Jackowski, Bhadresh Doshi, Prasad Gorijavalu; and
- **Torrent:** Paras Sheth, Dhurmit Shah, Sushil Jaiswal.
- Documents and communications with regulatory authorities, with special focus on regulatory communications regarding the cause of the contamination. *See* RFPD Nos. 52, 53, 54, 58, 59.
 - Plaintiffs have identified the following agreed-upon custodians as potentially having responsive documents:
 - **ZHP:** Jun Du, Jenson Ye, Xiaodi Guo, Lilje Wang, Remonda Gergis, Lucy Liu;
 - **Mylan:** Walt Owens, Reem Malki, Antonyraj Gomas, Cassandra Bird, Lance Molnar, SVSJ Rama Varma;
 - **Teva:** David Bonilla, Christopher Unger, Constance Truemper, Dan Baretto;
 - **Aurobindo USA:** Jasleen Gupta, Blessy Johns, Jeffrey Jackowski;
 - **Torrent:** Dawn Chitty, Sue Perry, Jocelyn Rivera, Bernadette Attinger, Saroja Garontla; and
 - **Hetero USA:** Seshu Akula, William Chelak, Rahhu Chigurupati, Somaraju Indukuri, Rajesh Kankula.
- Documents and communications related to the procurement of recovered solvents and/or the retention of outside companies to conduct solvent recovery. *See* RFPD Nos. 6, 119, 120.
 - Plaintiffs have identified the following agreed-upon custodians as potentially having responsive documents:
 - **Mylan:** M.V.R.B.S. Subrahmanyam, Abbineni Jyothibas, N. Anjani Kumar; and
 - **Teva:** Corey Sawyer.

In order to finalize lists of prioritized custodians, for all the above-listed custodians, Plaintiffs request that Defendants identify which of these custodial files have been collected, and which have not yet been collected. Plaintiffs believe understanding this information will allow Plaintiffs to more narrowly tailor their custodial file prioritization, keeping these requests in line with Defendants' ongoing custodial collection efforts.

Plaintiffs are available to meet-and-confer further on these requests. Please advise us as to your availability.

Sincerely,

KANNER & WHITELEY, L.L.C.

By:



Layne C. Hilton

CC: Counsel for Manufacturer Defendants
Valsartan PEC

EXHIBIT C

From: Layne Hilton <l.hilton@kanner-law.com>

Date: October 7, 2020 at 8:19:35 PM EDT

To: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>, "Ferretti, Joseph S." <JSFerretti@duanemorris.com>, "Priselac, Jessica" <JPriselac@duanemorris.com>, "rubensteinb@gtlaw.com" <rubensteinb@gtlaw.com>, "harkinss@gtlaw.com" <harkinss@gtlaw.com>, "CCT@pietragallo.com" <CCT@Pietragallo.com>, "JMR@pietragallo.com" <JMR@pietragallo.com>, "Nagle, Brittney" <bee.nagle@kirkland.com> (bee.nagle@kirkland.com)" <bee.nagle@kirkland.com>, "JHeinz@c-wlaw.com" <JHeinz@c-wlaw.com>, "Nakul Y. Shah" <nshah@HillWallack.com>, "Frank H. Stoy" <FHS@Pietragallo.com>, Vito Colasurdo Jr <vcolasurdo@HillWallack.com>
Cc: Conlee Whiteley <c.whiteley@kanner-law.com>, Adam Slater <ASlater@mazieslater.com>, Daniel Nigh <dnigh@levinlaw.com>, R H <rubhon@gmail.com>, "David J. Stanoch" <d.stanoch@kanner-law.com>, Valsartan PEC <valpec@kirtlandpackard.com>

Subject: In re Valsartan, Losartan and Irbesartan (Additional Priority Custodians)

Counsel:

Pursuant to the Court's October 2, 2020 Order (D.E. 585), Plaintiffs provide the following additional custodians to further supplement the priority custodians previously identified in their May 7, 2020, Letter:

ZHP

- Jun Du
- Eric Gu
- John Iozzia
- Chunmin "Min" (Karen) Xu
- Linda Lin

Mylan

- Michael Plastina
- Wayne Talton

- Lance Molnar
- Kim Kupec

Teva

- Orit Schwartz
- Tony Delicato
- Joerg Fluch
- Raphael Nudelman

Aurobindo

- Venkata Kota

Torrent

- Kelly Gegenheimer

Hetero

- Somaraju Indukuri
- Jyothi Ganti
- Venkataramana Madireddy
- Manoranjan Kumar

The above-listed names, in conjunction with the custodians identified in the attached May 7, 2020, letter, will constitute Plaintiffs' preliminary list of priority deponents, pursuant to D.E. 585. These names are being provided without prejudice to change and adjust priorities as documents continue to be produced to us on a rolling basis.

Please let Plaintiffs know when you are available to meet-and-confer regarding these potential deponents.

Best,

Layne

Layne Hilton

Kanner & Whiteley, L.L.C.

701 Camp Street

New Orleans, LA 70130

(504) 524-5777 voice

(504) 524-5763 fax

www.kanner-law.com

THIS EMAIL MESSAGE IS FOR THE SOLE USE OF THE INTENDED
RECIPIENT(S) AND MAY CONTAIN CONFIDENTIAL AND PRIVILEGED
INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT,
PLEASE CONTACT THE SENDER BY REPLY EMAIL AND DESTROY
ALL COPIES OF THE ORIGINAL MESSAGE. _____

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.

EXHIBIT D

From: Adam Slater <ASlater@mazieslater.com>
Sent: Thursday, December 17, 2020 5:36 PM
To: Priselac, Jessica; Christopher Geddis; Goldberg, Seth A.
Cc: Schwartz, Barbara; Hill, Coleen W.; Cheryll Calderon; lhilton@kanner-law.com; George T. Williamson; Ferretti, Joseph S.
Subject: Re: ZHP/Princeton/Solco Depositions Meet and Confer

Counsel:

Plaintiffs are writing to agree to schedule the depositions of the following witnesses per your email, with the length of the depositions to be subject to such issues as whether a translator is needed (we believe none of those listed below require a translator), the 30 b 6 topics to be addressed, and the size of the custodial and other relevant files to the subject matter of the depositions:

John Iozzia - January 20

Lijie Wang - January 26, please advise on 30 b 6 topics

Remonda Gergis - February 2

Hai Wang - February 16, please advise on 30 b 6 topics

With regard to Jun Du, we would appreciate earlier dates inasmuch as you are already targeting March for a number of important depositions, and Mr. Du is in New Jersey. We would also appreciate it if you could reconsider and designate Mr. Du on a 30 b 6 topic or topics since he is one of the easiest logistical depositions to conduct.

As to the balance of the deponents we really need to understand the topics they are being designated on, and the likely length of the depositions, for scheduling purposes.

We also will need to discuss the proposed loading of witnesses in March, as that puts us in a very difficult situation with regard to our expert reports. We need to address certain topics as early as possible, for example testing related topics, in order to advance our expert reports.

We look forward to speaking tomorrow.

Thank you,

Adam Slater

From: Priselac, Jessica
Sent: Thursday, December 17, 2020 11:41 AM
To: Christopher Geddis ; Goldberg, Seth A.
Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com ; George T. Williamson

; Ferretti, Joseph S.

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Counsel,

As an initial matter, we are disappointed that you still have not addressed any of the scheduling issues we wrote about more than one week ago, despite the fact that you committed to do so during our meet and confer last week. It is imperative that we schedule the depositions we proposed below as soon as possible so that that our witnesses can hold their deposition date on their schedules, and so that we can coordinate the logistics for these depositions. This is especially true for our witnesses who are in China, who must make extraordinary efforts to travel to Hong Kong during the COVID-19 pandemic (assuming that they will even receive permission to travel to Hong Kong during the pandemic). Having received no response from you on our original proposal, some of our witnesses can no longer be deposed on the dates we originally proposed, and their updated availability is below.

Further, as the dates we proposed in January and February for the U.S. witnesses are quickly approaching, please select a date John Iozzia, Lijie Wang, Remonda Gergis, and Hai Wang by tomorrow so that our witnesses can release the other dates we offered. If you do not respond by tomorrow, we will assume you are available any of the dates we proposed for these witnesses and will choose one, and will let the witness know they can release the other dates.

No.	Witness	Party	30(b)(6)?	Available Dates	Locale
1.	John Iozzia	Huahai US	No	January 20-22	U.S.
2.	Lijie Wang	Prinston	Yes	January 26, 28, 29	U.S.
3.	Remonda Gergis	Prinston	No	February 2-4	U.S.
4.	Hai Wang	Solco	Yes	February 16,17,18	U.S.
5.	Jun Du	ZHP/ Prinston/ Huahai US	No	March 18-19	U.S.
6.	Jay (Jie) Wang	ZHP	Yes	March 4-5	Hong Kong
7.	Linda (Lihong) Lin	ZHP	Yes	March 2-3	Hong Kong
8.	Peng Dong	ZHP	Yes	March 30-31	Hong Kong
9.	Eric Gu	SynCores	Yes	March 9-10	Hong Kong
10.	Minli Zhang	ZHP	Yes	March 16-17	Hong Kong

11.	Qiangming Li	ZHP	Yes	March 24-25	Hong Kong
12.	Min Li	ZHP	Yes	March 31-April 1	Hong Kong
13.	Jucai Ge	ZHP	Yes	March 11-12	Hong Kong

As a point of clarification, for the witnesses located in China, the dates we are proposing are the dates in Hong Kong. For example, we have proposed March 2 for Linda Lin, which means her deposition would begin the morning of March 2 in Hong Kong, and the evening of March 1 in the United States.

As to your most recent email, it is unfortunate that we must consistently waste time correcting Plaintiffs' mischaracterizations in written communications, such as the one in your email regarding the ZHP entities' productions – to be clear, ZHP has complied with the Court's orders regarding document productions. To the extent you are now claiming our production is "incomplete" due to the fact Guillem Boixados' custodial file has not yet been produced in its entirety, I would remind you that we agreed to provide you his custodial files as a courtesy and the production of his files has not been ordered by the Court; you requested his files well after the Court's deadline for making such requests; and Plaintiffs agreed his files would be provided after Nov. 30.

With respect to the witnesses you have requested below, we are available tomorrow at 9:30 am for a meet and confer, at which time we expect you will be able to discuss why these witnesses are not duplicative of the witnesses we have previously offered. Please let us know if you are available at that time.

Best regards,

Jessica

Jessica Priselac
Attorney at Law

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1159
F: +1 215 827 5486
C: +1 650 224 9097

JPriselac@duanemorris.com
www.duanemorris.com

From: Christopher Geddis
Sent: Thursday, December 17, 2020 9:39 AM
To: Priselac, Jessica ; Goldberg, Seth A.
Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com; George T. Williamson
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Counsel,

We write in follow up to our most recent discussion regarding ZHP deponents. We look forward to receiving the additional information you are providing, including the list of 30(b)(6) topics each witness you identified as a corporate designee will address. Subject to that information, Plaintiffs' continuing review of the ZHP Defendants' production, which is not entirely complete at this time, and the right to add deponents based on the further review of the production, including for example custodian Guiollome Boixados, whose custodial file has not yet been produced in its entirety, Plaintiffs propose the below listed additional deponents:

- Yuelin Hu of API Quality Assurance,
- Yanfeng (Lucy) Liu of API Regulatory Affairs,
- Fengyang (Xavier) Tang of Market Development,
- Mi (Karen) Xu of Market Development,
- Eric Tsai of Prinbury,
- Xiaodi Guo of Huahai US and Princeton, and
- Baohua Chen.

Because Plaintiffs do not have Baohua Chen's custodial file, we request production of his custodial file in order to conduct his deposition.

If you do not agree to any of the above deponents, please advise and provide some times when you are available to meet and confer on the issue.

Best,
Chris

Christopher J. Geddis
Associate Attorney
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 228-9898
cgeddis@mazieslater.com
www.mazieslater.com



The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or Mazie Slater Katz & Freeman, LLC (Tel: 973-228-9898) immediately and delete this message, along with any attachments, from your computer. Thank you.

From: Priselac, Jessica
Sent: Tuesday, December 8, 2020 11:12 AM
To: Christopher Geddis ; Goldberg, Seth A.

Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com; George T. Williamson

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Subject to the parties reaching agreement on the length of 30(b)(6) testimony, or the Court issuing an order thereon, and subject to certain other requirements, such as a witness's right to invoke Chinese state secrecy and/or privacy rules, ZHP, Prinston, and Solco propose the following witnesses for individual and 30(b)(6) testimony, along with the dates of their availability and the locale in which they will be appearing for their deposition:

No.	Witness	Party	30(b)(6)?	Available Dates	Locale
1.	John Iozzia	Huahai US	No	January 20-22	U.S.
2.	Lijie Wang	Prinston	Yes	January 26, 28, 29	U.S.
3.	Remonda Gergis	Prinston	No	February 2-4	U.S.
4.	Hai Wang	Solco	Yes	February 16,17,18	U.S.
5.	Jun Du	ZHP/ Prinston/ Huahai US	No	March 10,11	U.S.
6.	Jay (Jie) Wang	ZHP	Yes	March 2-3	Hong Kong
7.	Linda (Lihong) Lin	ZHP	Yes	March 4-5	Hong Kong
8.	Peng Dong	ZHP	Yes	March 8-9	Hong Kong
9.	Eric Gu	SynCores	Yes	March 11-12	Hong Kong
10.	Minli Zhang	ZHP	Yes	March 16-17	Hong Kong
11.	Qiangming Li	ZHP	Yes	March 18-19	Hong Kong
12.	Min Li	ZHP	Yes	March 24-25	Hong Kong
13.	Jucai Ge	ZHP	Yes	March 31 – April 1	Hong Kong

We look forward to our meet and confer with you on this issue later today.

Best regards,

Jessica

Jessica Priselac
Attorney at Law

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1159
F: +1 215 827 5486
C: +1 650 224 9097

JPriselac@duanemorris.com
www.duanemorris.com

From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, December 4, 2020 5:11 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

3:00 pm ET on Tuesday works for Plaintiffs. Ahead of the call, please let us know via email some preliminaries, such as the identities of deponents, where they are located or where the depositions would take place (if not remote), available dates, etc. This will allow for a more productive meet and confer.

Thanks,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Friday, December 4, 2020 11:33 AM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Chris, we are available at 1:00 or 3:00 on Tuesday.

Duane Morris
www.duanemorris.com

Seth A. Goldberg
Partner

P: +1 215 979
1175
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
F: +1 215 689
2198
C: +1 267 632
1620

[E-MAIL](#) | [BIO](#) | [VCARD](#)

From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Friday, December 4, 2020 10:56 AM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

Plaintiffs are available Tuesday at 2:00 pm ET. Does that work for you?

And going forward, please include Adam, Cheryll, Layne, and George on emails regarding the ZHP entities' depositions. Thanks.

Best,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Thursday, December 3, 2020 3:51 PM

To: Christopher Geddis <CGeddis@mazieslater.com>

Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Please let us know if Monday at 1:00 works for you to discuss the ZHP/Prinston/Solco depositions.

Seth


www.duanemorris.com
Seth A. Goldberg
Partner

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196

P: +1 215 979 1175
F: +1 215 689 2198
C: +1 267 632 1620

[E-MAIL](#) | [BIO](#) | [VCARD](#)

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams
Magistrate Court Judge

DECLARATION OF WANG MA

STATE OF NEW JERSEY)
)
County of Bergen)

I, Wang Ma, state:

I am the Senior Director of Human Resource Department of Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), a publicly-traded company listed on the Shanghai Stock Exchange, and state the following regarding Yuelin Hu, Yanfeng (Lucy) Liu, and Fengyang (Xavier) Tang:

Yuelin Hu

1. Ms. Hu is a Chinese national who resides in China.
2. Ms. Hu works in the API Quality Assurance Department.
3. Ms. Hu reports up to Jucai Ge, who reported up to Cunxiao (Jenson) Ye.

4. Ms. Hu does not have independent decision making authority to bind ZHP without sign off from a supervisor.
5. Ms. Hu follows program guidelines and corporate policies and procedures, and elevates important issues to her supervisor.
6. Ms. Hu cannot release product without Qualified Person's authorization and approval.
7. Ms. Hu cannot hire or fire other employees without approval from a supervisor.
8. Ms. Hu would not be expected to represent ZHP or to speak on behalf of ZHP on corporate matters or on valsartan manufacturing, quality, sales, or regulatory issues.
9. Ms. Hu's job responsibilities may be described as: 1) Carry out daily management of API Quality Assurance Department of east zone of Chuannan Site; 2) Assist in the planning, construction and promotion of the quality management system in the east zone of Chuannan Site; 3) Assist the Qualified Person in other relevant tasks assigned.

Yanfeng (Lucy) Liu

1. Ms. Liu is a Chinese national who resides in China.
2. Ms. Liu works in the API Regulatory Affairs Department.

3. Ms. Liu reports up to Linda (Lihong) Lin, who reports up to Baohua Chen.
4. Ms. Liu does not have independent decision making authority to bind ZHP without sign off from a supervisor.
5. Ms. Liu follows program guidelines and corporate policies and procedures, and elevates important issues to her supervisor.
6. Ms. Liu cannot bind ZHP on regulatory matters or communicate with the FDA without supervisor involvement or approval.
7. Ms. Liu cannot hire or fire other employees without approval from a supervisor.
8. Ms. Liu would not be expected to represent ZHP or to speak on behalf of ZHP on corporate matters or on valsartan manufacturing, quality, sales, or regulatory issues.
9. Ms. Liu's job responsibilities may be described as:

Assist supervisor to: 1) Carry out daily management of API Regulatory Affairs Department; 2) Establish product registration plan according to the requirements of the company's development strategy; supervise the staff of the Department to complete API product registration, post-authorization change application, deficiency letter reply, product

registration file maintenance, and timely payment of the registration fee;

3) Other tasks of the department assigned by supervisor.

Fengyang (Xavier) Tang

1. Mr. Tang is a Chinese national who resides in China.
2. Mr. Tang works in the Marketing and Sales Department.
3. Mr. Tang reports up to Mi (Karen) Xu, who reports up to Jie Wang.
4. Mr. Tang does not have independent decision making authority to bind ZHP without sign off from a supervisor.
5. Mr. Tang follows program guidelines and corporate policies and procedures, and elevates important issues to his supervisor.
6. Mr. Tang cannot contract for API or finished dose without supervisor approval.
7. Mr. Tang cannot hire or fire other employees without approval from a supervisor.
8. Mr. Tang would not be expected to represent ZHP or to speak on behalf of ZHP on corporate matters or on valsartan manufacturing, quality, sales, or regulatory issues.
9. Mr. Tang's job responsibilities may be described as: 1) Assist supervisor to establish business development strategy, contact and coordinate the resources of various departments, so as to facilitate normal business

negotiation activities; 2) Establish and maintain customer files, share it within the scope of authorization, and provide effective service support for sales activities, such as necessary information and customer Q & A; 3) Reception of customers visiting and auditing; 4) Other tasks assigned by supervisor.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 18, 2021



Wang Ma



EXHIBIT F

**ZHP00004925 - Document was designated confidential
and will be provided separately to Counsel and the Court**

EXHIBIT G

**ZHP00000913 - Document was designated confidential
and will be provided separately to Counsel and the Court**